

**UNITED STATES DISTRICT COURT
FOR WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and
JOHN MEINERS, individually and on
behalf of themselves and all others similarly
situated,

Plaintiffs,
v.

NATIONAL ASSOCIATION OF
REALTORS, *et al.*

Defendants.

Case No. 23-CV-00788

Hon. Stephen R. Bough

DANIEL UMPA, individually and on behalf
of themselves and all others similarly
situated,

Plaintiffs,
v.

NATIONAL ASSOCIATION OF
REALTORS, *et al.*

Defendants.

Case No. 23-CV-00945

Hon. Stephen R. Bough

DEFENDANT REDFIN CORPORATION'S MOTION TO DISMISS

For the reasons set forth in the accompanying Suggestions in Support of Defendant Redfin Corporation's ("Redfin") Motion to Dismiss, Redfin, through its undersigned counsel, respectfully moves to dismiss Plaintiffs' Complaints in *Gibson v. Nat'l Ass'n of Realtors*, No. 23-CV-00788 and *Umpa v. Nat'l Ass'n of Realtors*, No. 23-CV-00945, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: February 26, 2024

/s/ Eytayo St. Matthew-Daniel
Eytayo St. Matthew-Daniel (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
Telephone: (212) 373-3000
tstmatthewdaniel@paulweiss.com

Karen Dunn (*pro hac vice*)
William A. Isaacson (*pro hac vice*)
Martha L. Goodman (*pro hac vice*)
Bryon P. Becker (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
2001 K Street NW
Washington, DC 20006-1047
Telephone: (202) 223-7300
kdunn@paulweiss.com
wisaacson@paulweiss.com
mgoodman@paulweiss.com
bpbecker@paulweiss.com

Brian J. Madden (Mo. Bar No. 40637)
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue
Suite 300
Kansas City, MO 64112-2255
Telephone: (816) 701-1132
Facsimile: (816) 531-2372
bmadden@wcllp.com

Attorneys for Defendant Redfin Corporation

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on February 26, 2024, I electronically filed the foregoing Motion to Dismiss with the Clerk of the Court using the CM/ECF system which sent notification of filing to all counsel of record.

/s/ Eyitayo St. Matthew-Daniel

Eyitayo St. Matthew-Daniel (*pro hac vice*)
**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019-6064
Telephone: (212) 373-3000
tstmatthewdaniel@paulweiss.com

Attorney for Defendant Redfin Corporation